## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF THE KINGDOM OF DENMARK (SKATTEFORVALTNINGEN) TAX REFUND SCHEME LITIGATION

This document relates to case no. 18-cv-09494.

MASTER DOCKET 18-md-2865 (LAK)

## [PROPOSED] CONSENT JUDGMENT

WHEREAS, on June 14, 2018, plaintiff Skatteforvaltningen ("SKAT") commenced this action against defendants Tew Enterprises, LLC Retirement Plan ("Tew Enterprises") and Andrea Tew, and on April 24, 2020, SKAT filed an amended complaint against the defendants (the foregoing collectively hereinafter referred to as the "Action");

WHEREAS, SKAT and defendants Tew Enterprises now wish to resolve all the claims SKAT asserted in the Action against Tew Enterprises;

NOW THEREFORE, without trial or adjudication of issue of fact or law, and upon Tew Enterprises' consent, the Court finds that there is good and sufficient cause to enter this Consent Judgment, and that IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED THAT:

- 1. This Consent Judgment is hereby entered in favor of plaintiff SKAT against defendant Tew Enterprises in the amount of \$2,389,000 (US); and
- 2. Defendant Tew Enterprises shall be liable to pay the amount set forth in paragraph 1.
  - 3. Each party shall bear its own attorneys' fees and costs.

## **EXECUTION COPY**

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain

jurisdiction of this matter for the purposes of enforcing the terms of this Consent Judgment.

Dated: New York, New York June >, 2021

By:

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Counsel for Plaintiff Skatteforvaltningen (Customs and Tax Administration of the Kingdom of Denmark)

SO ORDERED:

Lewis A. Kaplan

United Stated District Judge

By: \_\_\_\_\_

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